

BROWN RUDNICK LLP

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Howard S. Steel

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)

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**DECLARATION OF NO OBJECTIONS TO
MOTION FOR ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. § 365 AND
BANKRUPTCY RULE 2090-1(e) AUTHORIZING THE MOTION TO WITHDRAW AS
COUNSEL FOR ASR LEVENSVERZEKERING, N.V., FALCON LEVEN N.V., AND
N.V. AMERSFOORTSE LEVENSVERZEKERING MAATSCHAPPIJ**

I, Howard S. Steel, declare as follows:

1. I am a Partner in the law firm of Brown Rudnick LLP ("**Brown Rudnick**") and submit this Declaration pursuant to 28 U.S.C. § 1746 in connection with Brown Rudnick's *Notice and Motion to Withdraw as Counsel for ASR Levensverzekering N.V., Falcon Leven N.V., and N.V. Amersfoortse Levensverzekering Maatschappij* [ECF No. 51852] (the "**Motion**").

2. In accordance with the Case Management Order [ECF No. 9635], Brown Rudnick LLP established an objection deadline of February 16, 2016 at 4:00pm (Eastern Time) (the "**Objection Deadline**") for parties to object or file responses to the Motion. The Case Management Order and Local Rule 9075-2 provide that pleadings may be granted without a hearing, provided that no objection or other responsive pleading have been filed on or prior to

the Objection Deadline and the attorney for the party who filed the pleading complies with the relevant procedural and notice requirements.

3. More than forty-eight hours have passed since the Objection Deadline and, to the best of my knowledge, no objection, responsive pleading, or request for a hearing with respect to the Motion has been: (i) filed with the Court on the docket of the above-referenced case: or (ii) served on Brown Rudnick LLP.

4. Accordingly, pursuant to the Case Management Order, Brown Rudnick requests that the relief requested in the Motion be granted by the Court through and by the proposed order attached hereto as Exhibit A, which is unmodified from the proposed order attached as Exhibit A to the Motion.

I declare under penalty of perjury that the foregoing is true and correct.

BROWN RUDNICK LLP

By: /s/ Howard S. Steel
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